



REDACTED – FOR PUBLIC INSPECTION

Via ECFS

June 27, 2017


Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket 14-58, ETC Annual Report and Certification
Willard Telephone Company, Study Area Code 462210**

Dear Ms. Dortch:

Pursuant to sections 54.313 and 54.422 of the Commission's Rules Willard Telephone Company hereby submits its annual Form 481. Willard Telephone Company seeks confidential treatment of its financial information under the FCC's protective Order for section 54.313(f)(2)¹ and is filing a redacted version in the Electronic Comment Filing System.

Respectfully submitted,



Ashley Kopp
Senior Financial Consultant

¹ In the Matter of Connection America Fund, WC Docket No. 10-90; ETC Annual Reports and Certifications, WC Docket No. 14-58. Protective Order, DA 16-296, rel. March 22, 2016. ("Protective Order").

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	462210
<015>	Study Area Name	WILLARD TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Aimee Dollerschell
<035>	Contact Telephone Number: Number of the person identified in data line <030>	9702284571 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	adollerschell@willardtell.com

Form Type

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<010>	Study Area Code	462210
<015>	Study Area Name	WILLARD TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Aimee Dollerschell
<035>	Contact Telephone Number - Number of person identified in data line <030>	9702284571 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com

<210> For the prior calendar year, were there any reportable voice service outages? No

[illegible]

**(300) Unfulfilled Service Request
Data Collection Form**FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	462210
<015>	Study Area Name	WILLARD TEL CO
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

0

<330> Detail on attempts (broadband)

Name of Attached Document

<010>	Study Area Code	462210
<015>	Study Area Name	WILLARD TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Aimee Dollerschell
<035>	Contact Telephone Number - Number of person identified in data line <030>	9702284571 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed voice	
<410>	Complaints per 1000 customers for fixed voice	0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize. Offered only fixed broadband	
<440>	Complaints per 1000 customers for fixed broadband	0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

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<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes

<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations		FCC Form 481
Data Collection Form		OMB Control No. 3060-0986/OMB Control No. 3060-0819
		July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

OMB Control No. 3060-0986/OMB Control No. 3060-0819

OMB Control No. 3060-0986/OMB Control No. 3060-0819

<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com
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1/1/2017

-- See attached worksheet

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[illegible]

**(800) Operating Companies
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com
<810>	Reporting Carrier	Willard Telephone Company
<811>	Holding Company	Not Applicable
<812>	Operating Company	Willard Telephone Company

[illegible]

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**(900) Tribal Lands Reporting
Data Collection Form**

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 July 2013

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<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes, No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

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<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification Yes

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

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<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

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<1210> Terms & Conditions of Voice Telephony Lifeline Plans

Name of Attached Document

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

- | | |
|--|-------------------------------------|
| <1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, | <input checked="" type="checkbox"/> |
| <1222> Details on the number of minutes provided as part of the plan, | <input checked="" type="checkbox"/> |
| <1223> Additional charges for toll calls, and rates for each such plan. | <input checked="" type="checkbox"/> |

(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

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Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<p><2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p> <p><2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p> <p><2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p><2024A> Round 2 Recipient of Incremental Support?</p> <p><2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p> <p><2025A> Round 2 Recipient of Incremental Support?</p> <p><2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p> <p><2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 20px; width: 100px; margin-bottom: 10px;"></div>	<p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div> <p>Name of Attached Document Listing Required Information</p> <div style="border: 1px solid black; height: 60px; width: 100%;"></div>
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(2005) Price Cap Carrier Additional Documentation

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	

REDACTED - FOR PUBLIC INSPECTION

REDACTED

[The Financial Statement of Willard Telephone Company filed pursuant to 47 C.F.R. § 54.313(f)(2) is redacted in its entirety as Highly Confidential Information]

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4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.

Name of Attached Document Listing Required Information

Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.

Name of Attached Document Listing Required Information

4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.

Name of Attached Document Listing Required Information

**Certification - Reporting Carrier
Data Collection Form**

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 July 2013

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TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier: WILLARD TEL CO	
Signature of Authorized Officer: CERTIFIED ONLINE	Date 06/20/2017
Printed name of Authorized Officer: Aimee Dollerschell	
Title or position of Authorized Officer: Manager	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier: 462210	Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

**Certification - Agent / Carrier
Data Collection Form**

 FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) _____ is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date:
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	
Name of Authorized Agent Firm:	
Signature of Authorized Agent or Employee of Agent:	Date:
Name of Authorized Agent Employee:	
Title or position of Authorized Agent or Employee of Agent:	
Telephone number of Authorized Agent or Employee of Agent:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

FCC Form 481 Certifications

FCC Form 481 Lines 510
Willard Telephone Company
SAC 462210

Line 510: Service Quality Standards & Consumer Protection Rules Compliance

Service Quality Standards

The company complies with the service quality standards set forth in the following sections of the Colorado Public Utilities Commission (CoPUC) Rules, 4 Code of Colorado Regulations (CCR) 732-2:

- §2334 Construction and Maintenance Practices
- §2337 Standard Performance Characteristics for Customer Access Lines
- §2338 Interexchange Trunk Connections
- §2340 Network Call Completion Requirements

Consumer Protection Rules

The company complies with the following consumer protection rules:

- FCC rules regarding verification of orders for telecommunications service as required of submitting carriers {47 CFR §64.1100}
- CoPUC rule 4 CCR 732-2.2311 Changing Provider/Carrier Presubscription
- The FCC's Truth-in-Billing Requirements {47 CFR §64.2400}
- CoPUC rule 4 CCR 732-2.2304 Customer-Billing Requirements
- All of the requirements of 47 C.F.R. § Part 64 Subpart U, Customer Proprietary Network Information and Federal Trade Commission 16 C.F.R. §681, Identity Theft Red Flags

FCC Form 481 Certifications

FCC Form 481 Lines 610
Willard Telephone Company
SAC 462210

Line 610: Functionality in Emergency Situations

- The company maintains a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations. {47 CFR §54.202(a)}
- The company has made reasonable provisions to meet emergencies resulting from power failures; sudden and prolonged increases in traffic; staff shortages; and fire, storm, and acts of god. {4 CCR 732-2.2335 The Provision of Service During Maintenance or Emergencies}

(700) Price Offerings including Voice Rate Data Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<701>	Residential Local Service Charge Effective Date	1/1/2017
<702>	Single State-wide Residential Local Service Charge	

<703>

[illegible]

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(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	462210
<015>	Study Area Name	WILLARD TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Aimee Dollerschell
<035>	Contact Telephone Number - Number of person identified in data line <030>	9702284571 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	adollerschell@willardtell.com

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FCC Form 481 Certifications

FCC Form 481 Line 1210

Willard Telephone Company

SAC 462210

Line 1210: Lifeline Terms and Conditions

Lifeline subscribers receive unlimited local calling at a discount of \$9.25.

LIFELINE ASSISTANCE PROGRAM

COLORADO DIRECT SERVICE PROGRAMS

(D) (N)

CONDITIONS

Lifeline Assistance is a government assistance program developed to reduce rates for primary residential telephone service to qualifying subscribers who receive income-based benefits. The Company participates in this program to increase the availability of telecommunications services to all consumers in its service area.

DESCRIPTION

The Lifeline Assistance reduces an eligible customer's monthly rates for local service. An eligible customer receives a federally subsidized credit toward the monthly cost of basic telephone service.

The Link Up support has been eliminated due to the result of the Lifeline/Link Up Order released by the Federal Communications Commission on February 6, 2012. This order eliminates the Link Up as of April 1, 2012

Eligible customers may obtain Toll Blocking or Limited Toll Blocking free of charge. Toll Blocking is a service that does not allow any toll calls (1+, or 0+). Limited Toll Blocking provides the customer with limited ability to make toll calls by dialing 0+, and using a calling card, credit card, or prepaid calling card. Billed number screening is applied to all lines equipped with Toll Blocking or Limited Toll Blocking. Billed number screening prevents most third party, and collect calls from being charged to the access line.

Eligible customers that elect to take Toll Blocking will not be required to pay a service deposit.

Service will not be disconnected for nonpayment of toll as long as the eligible customer continues to pay the local service charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.

(D) (N)

LIFELINE ASSISTANCE PROGRAM

COLORADO DIRECT SERVICE PROGRAMS (Cont'd)

(D) (N)

UNDERTAKING OF THE COMPANY

The Telephone Company will begin providing the services and Lifeline Assistance Program discounts described in Section 4.1 preceding on the date this tariff is approved or becomes effective by operation of law.

The Telephone Company will waive the Service Order Charges to change to or from the Lifeline Assistance Program due to change in eligibility status.

The Telephone Company will keep accurate records of the revenues they forgo in reducing their customary charges as a result of this program in conformity with 47 CFR §54.403 and §54.411. Pursuant to 47 CFR §54.401(d) the Telephone Company will provide the records to the federal Administrator.

If the Company receives notification from the program administrator that the subscriber is receiving Lifeline service from another eligible telecommunications carrier or that more than one member of the subscriber's household is receiving Lifeline service, the subscriber will be de-enrolled from Lifeline Assistance without notice within five (5) business days following the Company's receipt of that notice.

The Company will process all applications and apply the appropriate credit on the customer's monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance.

LIMITATIONS

The discounts are applicable only on the end user's principal residence line.

Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.

One low income credit is available per household and is applicable to the primary residential connections only.

A Lifeline customer may subscribe to any local service offering available to other residential customers.

(D) (N)

LIFELINE ASSISTANCE PROGRAM

COLORADO DIRECT SERVICE PROGRAMS (Cont'd)

(D)(N)

OBLIGATION OF THE END USER

The end user seeking the Lifeline Assistance Program discounts are responsible for providing acceptable documentation as poof of their eligibility.

The Company will confirm a subscriber's continued eligibility to receive Lifeline service on an annual basis by requiring the subscriber to sign a certification as to his/her present qualifications for Lifeline service. Upon a determination of ineligibility, the credit will be discontinued on the bill if the customer fails to provide proof of eligibility within thirty (30) days following written notification to the customer.

(A) To constitute a qualifying low-income customer eligible to receive Lifeline services, a customer must meet the requirements set forth in either paragraph 1 or 2 below:

1. A customer's household income must be at or below 135% of the Federal Poverty Guidelines for a household of that size;

(a) For purposes of these rules, "income" is defined as all income actually received by all members of a household. This includes salary before deductions for taxes, public assistance benefits, social security payments, pensions, unemployment compensation, veteran's benefits, inheritances, alimony, child support payments, work's compensation benefits, gifts, lottery winnings, and the like. The only exceptions are student financial aid, military housing and cost-of-living allowances, irregular income from occasional small jobs such as baby-sitting or lawn mowing, and the like.

(b) A "household" is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen (18) years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen (18) living with their parents or guardians are considered to be part of the same household as their parents or guardians.

(D)(N)

LIFELINE ASSISTANCE PROGRAM

COLORADO DIRECT SERVICE PROGRAMS (Cont'd)

(N)

OBLIGATION OF THE END USER (Cont'd)

2. Lifeline Assistance is also available to all residential customers who participate in any of the following low income assistance programs. A subscriber will also be considered to be eligible even if he does not personally participate in any of the following programs, so long as an individual who lives in his household, and for whom he is financially responsible, does participate in at least one of these programs.
 - (a) Supplemental Security Income (SSI)
 - (b) Supplemental Nutrition Assistance Program (SNAP)
 - (c) Medicaid
 - (d) Federal Public Housing Assistance/Section 8
 - (e) Low Income Home Energy Assistance Program (LIHEAP)
 - (f) Temporary Assistance to Needy Families (TANF)
 - (g) National School Lunch Program's Free Lunch Program
3. In addition to meeting the qualifications provided in paragraph 1 or 2 of this section, in order to constitute a qualifying low-income customer, a customer must not already be receiving a Lifeline service, and there must not be anyone else in the subscriber's household subscribed to a Lifeline service.

RATES

Rates for qualifying Lifeline customers are specified on Sheet No. 20 preceding.

Lifeline Assistance Surcharge
Per Access Line

\$0.00

(N)

MILESTONE CERTIFICATION

June 13, 2017

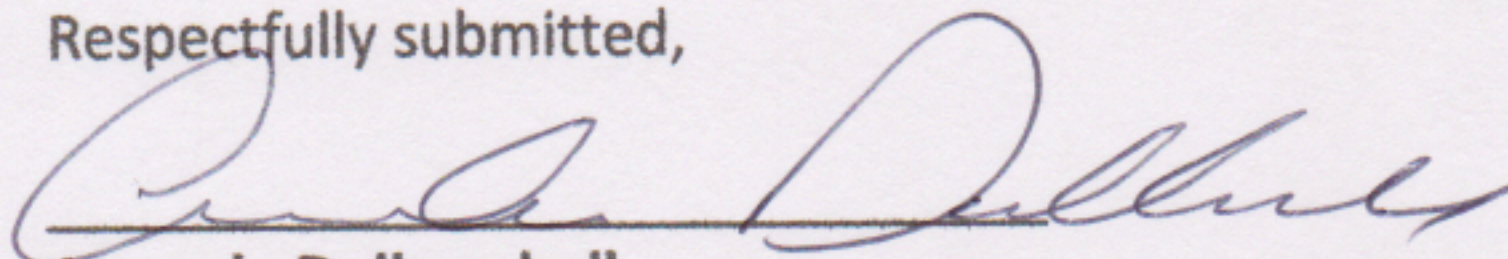
Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street SW
Room TW-A325
Washington, D.C. 20554

Re: Form 481 Line 3010 - Milestone Certification Pursuant to 47 C.F.R. § 54.313(f)(1)(i)

Dear Ms. Dortch:

Willard Telephone Company, Study Area Code 462210, in accordance with 47 C.F.R. § 54.313(f)(1)(i) of the Commission's rules, hereby certifies that it is taking reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time.

Respectfully submitted,



Amanda Dollerschell
Manager, Willard Telephone Company

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REDACTED

[The Financial Statement of Willard Telephone Company filed pursuant to 47 C.F.R. § 54.313(f)(2) is redacted in its entirety as Highly Confidential Information]